

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA - STATESVILLE DIVISION**

In re:)
)
Ernie Lee Earp) Case No. 19-50122
Mary Marie Earp)
)
TIN: xxx-xx-4896) Chapter 13
xxx-xx-2416)
)
Debtor(s).)

**AMENDMENT TO CHAPTER 13 PLAN
AND NOTICE OF OPPORTUNITY FOR HEARING ON CONFIRMATION OF THE PLAN
FOR CASES FILED ON OR AFTER DECEMBER 1, 2017**

Check if applicable to this plan amendment:

1.1	A limit on the amount of a secured claim that may result in a partial payment or no payment at all to the secured creditor (Part 3.2)	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.2	Avoidance of a judicial lien or nonpossessory, nonpurchase-money security interest (Part 3.4)	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.3	Request for termination of the 11 U.S.C. § 362 stay as to surrendered collateral (Part 3.5)	<input type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.4	Request for assumption of executory contracts and/or unexpired leases (Part 6)	<input type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.5	Nonstandard provisions	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included

The Chapter 13 Plan, including certain motions and other provisions, is hereby **amended** as follows:

THE CHAPTER 13 PLAN IS HEREBY AMENDED TO PROVIDED THAT THE JUDGMENT LIEN OF FORD MOTOR CREDIT SHALL BE TREATED AS A GENERAL UNSECURED CLAIM AND AVOIDED IN FULL UPON DISCHARGE. THE AMENDED PLAN ALSO PROVIDES THAT THE SECURED CLAIM OF W.S. BADCOCK CORPORATION (CLERK CLAIM # 2) SHALL BE BIFURCATED, WITH \$500.00 OF SAID CLAIM TO BE TREATED AS SECURED AT THE TILL RATE OF INTEREST AT 7.50%, AND THE BALANCE OF SAID CLAIM TO BE TREATED AS A GENERAL UNSECURED CLAIM.

TAKE NOTICE: Your rights may be affected. You should read this amendment to the Chapter 13 Plan carefully, including any motions contained in the amended plan, and discuss them with your attorney, if you have one, in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to confirm the Debtor's proposed Plan as amended, or if you want the Court to consider your views on these matters, then you and/or your attorney must file a written objection to confirmation and request for hearing on confirmation at one of the following addresses:

Cases filed in the Charlotte or Shelby Divisions:

Physical & Mailing Address: Clerk, U.S. Bankruptcy Court, 401 West Trade Street, Room 111, Charlotte, N.C. 28202

Cases filed in the Statesville Division:

Physical Address: Clerk, U.S. Bankruptcy Court, 200 West Broad Street, Room 301, Statesville, N.C. 28677
Mailing Address: Clerk, U.S. Bankruptcy Court, 401 West Trade Street, Room 111, Charlotte, N.C. 28202

Cases filed in the Asheville or Bryson City Divisions:

Physical & Mailing Address: Clerk, U.S. Bankruptcy Court, 100 Otis Street, Room 112, Asheville, N.C. 28801-2611

Your objection to confirmation and request for hearing must include the specific reasons for your objection and must be filed with the Court no later than 21 days following the conclusion of the § 341 meeting of creditors, or within 21 days of service of the amendment, whichever is later. If you mail your objection to confirmation to the Court for filing, you must mail it early enough so that the Court will receive it on or before the deadline stated above. You must also serve a copy of your objection to confirmation on the Debtor at the address listed in the notice of the meeting of creditors. The Debtor's attorney and the Chapter 13 Trustee will be served electronically. If any objections to confirmation are filed with the Court, the objecting party will provide written notice of the date, time, and location of the hearing. **No hearing will be held unless an objection to confirmation is filed.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the proposed plan of the Debtor as amended and may enter an order confirming the amended plan and granting the motions. **Any creditor's failure to object to confirmation of the proposed plan as amended shall constitute the creditor's acceptance of the treatment of its claim as proposed pursuant to 11 U.S.C. § 1325(a)(5)(A).**

I declare under penalty of perjury that the information provided in the Amendment to Chapter 13 Plan is true and correct as to all matters set forth herein.

Dated: 4/2/2019

/s/ Earnie Lee Earp

Ernie Lee Earp

Debtor's Signature

Dated: 4/2/2019

/s/ Mary Marie Earp

Mary Marie Earp

Debtor's Signature

I hereby certify that I have reviewed this document with the Debtor and that the Debtor has received a copy of this document.

Dated: 4/2/2019

/s/ Rod A. Vujovic

Rod A. Vujovic NC STATE BAR NO. 25021

Attorney for Debtor

[Attach Certificate of Service if Served on Creditor(s)]

Label Matrix for local noticing
0419-5

Case 19-50122
Western District of North Carolina
Statesville

Tue Apr 2 16:26:40 EDT 2019

Appalachain Regional Adult Medicine
336 Highway 105 Ext
Boone, NC 28607

AT&T
Bankruptcy Dept.
1801 Valley View Lane
Dallas, TX 75234-8906

Appalachain Regional Medical Associates
PO Box 14000
Belfast, ME 04915-4033

App Regional Medical Associates
950 State Farm Rd. Suite 200
Boone, NC 28607-5021

Badcock and More
2815 Highway 105 South
Boone, NC 28607-7308

Bankruptcy Administrator
Shelley K. Abel
402 W. Trade Street, Ste. 200
Charlotte, NC 28202-1673

Christina McAlpin Taylor
c/o Ford Motor Credit Company, LLC
Smith Debnam Narron Drake Saintsing
P.O. Box 176010
Raleigh, NC 27690-9701

Citifinancial
Bankruptcy Dept.
PO Box 6042
Sioux Falls, SD 57117-6042

Credit Acceptance Coproration
25505 West Twelve Mile Road
Southfield, MI 48034-8316

Equifax
PO Box 740241
Atlanta, GA 30374-0241

Exeter Finance LLC
P.O. BOX 204480
Dallas, TX 75320-4480

Exeter Finance LLCDEPARTMENT
AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Experian
PO Box 9701
Allen, TX 75013-9701

FMC-Omaha Service
PO Box 542000
Omaha, NE 68154-8000

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

Ford Motor Credit Company, LLC
Christina McAlpin Taylor
Smith Debnam Narron Drake Saintsing
P.O. Box 176010
Raleigh, NC 27690-9701

Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
P.O. Box 7317
Philadelphia, PA 19101-7317

J.P. Morgan Mortgage Acquisition Corp.
c/o Rushmore Loan Management Serv.
P.O. Box 55004
Irvine, CA 92619-5004

J.P. Mortgage Acquisition Corp.
c/o Rushmore Loan Management Serv.
P.O. Box 55004
Irvine, CA 92619-5004

NC Dept of Revenue
Office Services Division
Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

North Carolina Department of Revenue
Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

OneMain Financial
ATTN: BANKRUPTCY DEPT.
PO Box 3251
Evansville, IN 47731-3251

OneMain Financial
Attn: Bankruptcy Dept.
P.O. Box 6042
Sioux Falls, SD 57117-6042

OneMain Financial
PO BOX 3251
EVANSVILLE, IN 47731-3251

Professional Recovery Center
PO Box 51187
Durham, NC 27717-1187

Rushmore Loan Management Services
Attn: Bankruptcy Dept.
15480 Laguna Canyon Rd., #100
Irvine, CA 92618-2132

Rushmore Loan Management Services
PO Box 52708
Irvine, CA 92619-2708

Santander Consumer USA
Attn: BANKRUPTCY DEPT.
PO Box 560284
Dallas, TX 75356-0284

Smith, Debnam, Narron, Drake
 PO Box 176010
 Raleigh, NC 27619-6010

Transunion
 PO Box 2000
 Chester, PA 19016-2000

Document
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U.S. Attorney General
 U.S. Department of Justice
 950 Pennsylvania Avenue, NW
 Washington, DC 20530-0001

United States Attorney
 U.S. Courthouse
 100 Otis Street, Room 233
 Asheville, NC 28801-2688

Verizon Wireless
 PO Box 26055
 Minneapolis, MN 55426-0055

Verizon Wireless - Southeast
 Attn: Bankruptcy Department
 One Verizon Place
 Alpharetta, GA 30004-8510

W.S. Badcock Corporation
 Post Office Box 724
 Mulberry, FL 33860-0724

Watauga Anesthesia Associates
 895 State Farm Road, Suite 401
 Boone, NC 28607-6021

Watauga County Clerk of Court
 RE: 15-CVD-96
 Courthouse Box 13
 842 W. King Street
 Boone, NC 28607-4688

Watauga Medical Center
 PO Box 2600
 Boone, NC 28607-2600

Watauga Radiological Services
 155 Furman Rd
 Suite 101A
 Boone, NC 28607-5049

Watauga Radiological Services
 PO Box 603501
 Charlotte, NC 28260-3501

Watauga Surgical Group
 155 Furman Rd
 Suite 101
 Boone, NC 28607-5049

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Ford Motor Credit - Bankruptcy Dept.
 Bankruptcy Dept.
 PO Box 537901
 Livonia, MI 48153-7901

End of Label Matrix
 Mailable recipients 42
 Bypassed recipients 0
 Total 42